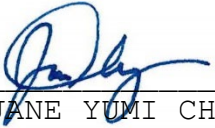


22 MAG 5668

Approved: 
JANE YUMI CHONG
Assistant United States Attorney

Before: THE HONORABLE VALERIE FIGUEREDO
United States Magistrate Judge
Southern District of New York

- - - - - X

UNITED STATES OF AMERICA : SEALED COMPLAINT

- v. -

: Violation of
18 U.S.C. §§ 371,
922(a)(1)(A), 924(a)(1),
924(n), and 2

ABOUDULAYE KEITA,
a/k/a/ "Abdoulaye,"
and

:

CEDRIC KEYON CHRISTOPHER, JR.,

COUNTY OF OFFENSE:
BRONX

:

Defendants.

- - - - - X

SOUTHERN DISTRICT OF NEW YORK, ss.:

LENNEA GORDON, being duly sworn, deposes and says that she is a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), and charges as follows:

COUNT ONE

(Conspiracy to Commit Firearms Offenses)

1. From at least in or about December 2020, up to and including in or about June 2021, in the Southern District of New York and elsewhere, ABOUDULAYE KEITA, a/k/a "Abdoulaye," and CEDRIC KEYON CHRISTOPHER, JR., the defendants, and others known and unknown, willfully and knowingly, did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, unlicensed dealing in firearms in violation of Title 18, United States Code, Section 922(a)(1)(A).

2. It was a part and an object of the conspiracy that ABOUDULAYE KEITA, a/k/a "Abdoulaye," and CEDRIC KEYON CHRISTOPHER, JR., the defendants, and others known and unknown, not being licensed importers, licensed manufacturers, and licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code, would and did knowingly engage in the business of dealing in firearms, and in the course of such

business would and did ship, transport, and receive firearms in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(a) (1) (A).

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal objects thereof, ABOUDULAYE KEITA, a/k/a "Abdoulaye," and CEDRIC KEYON CHRISTOPHER, JR., the defendants, committed the following overt acts, in the Southern District of New York and elsewhere:

a. On or about February 26, 2021, CHRISTOPHER purchased three firearms from a federal firearm licensee ("FFL") in Bryant, Arkansas.

b. CHRISTOPHER then sold and transferred at least one of the firearms to KEITA for transportation to the Bronx, New York, where the firearm was recovered by law enforcement on or about August 27, 2021.

(Title 18, United States Code, Section 371.)

COUNT TWO
(Gun Trafficking)

4. From at least in or about December 2020, up to and including in or about June 2021, in the Southern District of New York and elsewhere, ABOUDULAYE KEITA, a/k/a "Abdoulaye," and CEDRIC KEYON CHRISTOPHER, JR., the defendants, and others known and unknown, not being licensed importers, licensed manufacturers, and licensed dealers of firearms within the meaning of Chapter 44, Title 18, United State Code, would and did willfully and knowingly engage in the business of dealing in firearms, and in the course of such business would and did ship, transport, and receive firearms in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(a) (1) (A), to wit, CHRISTOPHER and a co-conspirator not named herein ("CC-1") purchased firearms from FFLs in Arkansas, and transferred and sold dozens of the firearms to KEITA and co-conspirators not named herein for transfer and resale in, among other places, the Bronx, New York.

(Title 18, United States Code, Sections 922(a) (1) (A), 924(a) (1), and 2.)

COUNT THREE

(Interstate Travel with Intent to Commit Gun Trafficking)

5. From at least in or about January 2021, up to and including in or about June 2021, in the Southern District of New York and elsewhere, ABOUDULAYE KEITA, a/k/a "Abdoulaye," the defendant, with the intent to engage in conduct that constitutes a violation of Title 18, United States Code, Section 922(a)(1)(A), traveled from one state into another state, and acquired, and attempted to acquire, a firearm in such other state, to wit, KEITA traveled between Arkansas and Tennessee and took bus trips between Tennessee and New York for the purpose of acquiring firearms, with the intent that the firearms be illegally resold in New York.

(Title 18, United States Code, Sections 924(n) and 2.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

6. I am a Special Agent with the ATF and I have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the investigation of this matter, my conversations with law enforcement agents, witnesses and others, as well as my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

OVERVIEW OF THE CONSPIRACY

7. As set forth in detail below, ABOUDULAYE KEITA, a/k/a "Abdoulaye," and CEDRIC KEYON CHRISTOPHER, JR., the defendants, and others known and unknown, have conspired to traffic at least 63 firearms both within Arkansas and from Arkansas to, among other places, New York City. Seven of the firearms have been recovered in the Bronx, one of the firearms has been connected to a shooting in the Bronx, one of the firearms has been connected to shootings in Harlem, and one of the firearms has been connected to the scene of a homicide in Little Rock. Specifically:

a. CC-1 and CHRISTOPHER are "straw purchasers" who each bought firearms in Arkansas and sold the firearms to KEITA for transportation to the Bronx, New York. Based on my training and experience, I know that a "straw purchaser" acquires firearms on behalf of someone who is prohibited by law from possessing one, or someone who wants to avoid being associated with the transaction.

b. CC-1 purchased at least 49 firearms from FFLs in Arkansas, and sold and transferred at least 46 of the firearms to KEITA and others for sale in and outside of Arkansas. To date, four of the firearms purchased by CC-1 have been recovered in the Bronx and three have been recovered in Arkansas.

c. CHRISTOPHER purchased at least 17 firearms from FFLs in Arkansas, and sold and transferred a number of the firearms to KEITA and others known and unknown for sale in New York and Arkansas. To date, three of the firearms purchased by CHRISTOPHER have been recovered in the Bronx and two have been recovered in Arkansas.

d. KEITA transported firearms purchased in Arkansas by bus from Memphis, Tennessee to New York, New York.

8. Based on my review of law enforcement records, I know that ABOUDULAYE KEITA, a/k/a "Abdoulaye," and CEDRIC KEYON CHRISTOPHER, JR., the defendants, are not licensed importers, manufacturers, or dealers of firearms.

PURCHASE OF FIREARMS FROM ARKANSAS FFLS

9. From my review of Firearms Transaction Records submitted by FFLs to the ATF ("ATF Form 4473s"), I know that CC-1 purchased at least 49 firearms from eight FFLs in Arkansas, and that CEDRIC KEYON CHRISTOPHER, JR., the defendant, purchased at least 17 firearms from four FFLs in Arkansas. Specifically:

a. From in or about May 2020 up to and including November 2021, CC-1 purchased (i) 25 firearms from an FFL in Sherwood, Arkansas ("FFL-1"), (ii) five firearms from an FFL in North Little Rock, Arkansas ("FFL-2"), (iii) four firearms from a second FFL in North Little Rock, Arkansas ("FFL-3"), (iv) two firearms from an FFL in Bryant, Arkansas ("FFL-4"), (v) two firearms from an FFL in Little Rock ("FFL-5"), (vi) eight firearms from a second FFL in Little Rock, Arkansas ("FFL-6"), (vii) one firearm from a third FFL in Little Rock ("FFL-7"),

and (viii) two firearms from an FFL in Jacksonville, Arkansas ("FFL-8").

b. From December 2019 up to and including April 2021, CHRISTOPHER purchased (i) three firearms from FFL-1, (ii) eight firearms from FFL-2, (iii) three firearms from FFL-4, (iv) and three firearms from an FFL in Little Rock ("FFL-9").

RECOVERY OF FIREARMS IN NEW YORK

10. From my review of ATF Form 4473s, police reports, and transactions made through a mobile payment application ("Payment App-1"), I believe that firearms purchased by CC-1 and CEDRIC KEYON CHRISTOPHER, JR., the defendant, from FFLs in Arkansas were transferred to ABOUDULAYE KEITA, a/k/a "Abdoulaye," the defendant, for transportation and resale in the Bronx, New York.

FOUR CC-1 FIREARMS RECOVERED IN NEW YORK

11. From ATF Form 4473s and New York City Police Department ("NYPD") reports, I know that one firearm purchased by CC-1 from FFL-1 on or about September 3, 2020, two firearms purchased by CC-1 from FFL-1 on or about May 25, 2021, and one firearm purchased by CC-1 from FFL-2 on or about May 25, 2021 were all subsequently recovered in the Bronx, New York. Based on lead information collected and maintained by the National Integrated Ballistic Information Network (NIBIN), I also know that casings from one of the recovered firearms have been connected to a shooting that took place in the Bronx on or about June 20, 2021, and that casings from another of the recovered firearms has been connected to shootings that took place in Harlem on or about July 5, 2021 and on or about October 6, 2021.

12. I believe that the firearms recovered from the Bronx were transferred to ABOUDULAYE KEITA, a/k/a "Abdoulaye," the defendant, for transportation to New York because Payment App-1 records show that on or about May 25, 2021, the day CC-1 purchased three of the four firearms, KEITA sent CC-1 two payments of \$400 and \$650 through Payment App-1. Based on my training and experience, I believe these payments were made for multiple firearms.

THREE CHRISTOPHER FIREARMS RECOVERED IN NEW YORK

13. From ATF Form 4473s and NYPD reports, I know that one of three firearms purchased by CEDRIC KEYON CHRISTOPHER, JR., the defendant, from FFL-2 on or about January 14, 2021 was

recovered in the Bronx on or about March 13, 2021; one of three firearms purchased by CHRISTOPHER from FFL-4 on or about February 26, 2021 was recovered in the Bronx on or about August 27, 2021; and one of three firearms purchased by CHRISTOPHER from FFL-9 on or about March 4, 2021 was recovered in the Bronx on or about April 4, 2021.

14. I believe that at least some of the firearms purchased by CEDRIC KEYON CHRISTOPHER, JR., the defendant, on or about January 14, 2021 and on or about February 26, 2021 were transferred to ABOUDULAYE KEITA, a/k/a "Abdoulaye," the defendant, for transportation to New York for the following reasons:

a. On or about January 15, 2021, the day after CHRISTOPHER purchased three firearms, an individual who, based on public records, I believe to be KEITA's relative ("CC-2") sent CHRISTOPHER a payment of \$1200 through Payment App-1.¹ Based on my training and experience, I believe this payment was made for multiple firearms.

b. On or about February 26, 2021, the day CHRISTOPHER purchased three firearms, KEITA sent CHRISTOPHER a payment of \$400 through Payment App-1. Based on my training and experience, I believe this payment was made for at least one firearm.

RECOVERY OF FIREARMS IN ARKANSAS

15. From my review of ATF Form 4473s and police reports, I know that additional firearms purchased by CC-1 and CEDRIC KEYON CHRISTOPHER, JR., the defendants, were recovered in Arkansas, and from my review of additional police reports and Payment App-1 transactions, I believe that at least some of those firearms were transferred to ABOUDULAYE KEITA, a/k/a "Abdoulaye," the defendant.

THREE CC-1 FIREARMS RECOVERED IN ARKANSAS

16. From an ATF Form 4473 and police reports, I know that a firearm purchased by CC-1 on or about August 28, 2020 from FFL-1 was transferred to ABOUDULAYE KEITA, a/k/a "Abdoulaye," the defendant, because it was seized from KEITA's possession in North Little Rock on or about October 7, 2020.

¹ From my review of text messages, I know that CC-1 provided his Payment App-1 account name to both KEITA and CC-2.

17. From an ATF Form 4473 and police reports, I know that one firearm purchased by CC-1 on or about August 11, 2021 from FFL-6 was recovered in Little Rock, Arkansas on or about September 9, 2021. From NIBIN lead information, I also know that casings from this firearm, and other firearms, were found at the scene of a homicide that took place in Little Rock on or about September 3, 2021.

18. I believe that the firearm purchased by CC-1 on or about August 11, 2021 was transferred to ABOUDULAYE KEITA, a/k/a "Abdoulaye," the defendant, because on or about that same day, August 11, 2021, KEITA sent CC-1 a payment of \$580 through Payment App-1.

**COMMUNICATIONS REGARDING THE FIREARMS INTENDED FOR
TRANSPORTATION TO NEW YORK**

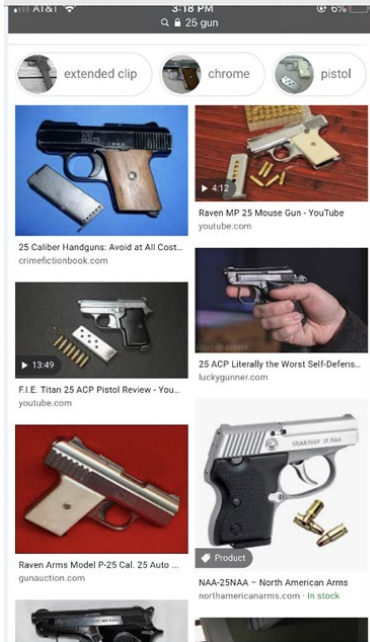
19. Based on my review of text messages between CC-1² and ABOUDULAYE KEITA, a/k/a "Abdoulaye," the defendant,³ I know that from at least in or about August 2020 up to and including in or about October 2021, KEITA actively participated in CC-1's firearms purchases from FFLs, instructed CC-1 about when to purchase firearms or which firearms to purchase, and referenced buyers who would be receiving the firearms. For example:

a. On or about August 6, 2020, KEITA and CC-1 exchanged the following text messages:

KEITA:	3 9s with laser
	.40
	.45
	2 .25
CC-1:	How ima get the 25
KEITA:	Fuck that get a S & W\
KEITA:	40

² CC-1 communicated using a phone with an Arkansas area code and subscribed in CC-1's name.

³ KEITA communicated using two phone numbers. One phone number has a New York City area code and is subscribed in KEITA's name. The second phone number has an Arkansas area code and is one of three verified phone numbers linked to a Facebook account believed to belong to KEITA, with a vanity name "abdoulaye.keita.144." In text messages sent by and to the number, the owner also identified himself as "Dulay" and was addressed repeatedly as "Dula," which I believe to be variations on KEITA's first name "Aboudulaye."



CC-1:

CC-1: Is this what they want?

b. Based on my training and experience, I believe that in the August 6, 2020 text exchange, KEITA was providing CC-1 a firearms shopping list, and that KEITA was referring to (i) three nine-millimeter firearms when KEITA requested "3 9s," (ii) one .40 caliber firearm when KEITA requested a ".40," (iii) one .45 caliber firearm when KEITA requested a ".45," (iv) two .25-millimeter firearms when KEITA requested "2 .25," and (v) a Smith & Wesson firearm when KEITA requested "a S & W."

c. On or about August 12, 2020, KEITA and CC-1 exchanged the following text messages:

CC-1: They got some guns for 359 through 409 but some im [sic] the middle
 CC-1: All balck [sic] sw 40 for the 359
 KEITA: Ok and what about 45
 CC-1: Cheapest one is a ruger
 CC-1: For 479
 KEITA: How much for are glocks
 CC-1: Glock 33 is \$519 it shoot357
 KEITA: We getting it !!
 CC-1: Lol when they sending the money im here now
 KEITA: I'm coming back Monday
 CC-1: So we gone wait?

d. Based on my training and experience, I believe that in the August 12, 2020 text exchange, CC-1 and

KEITA were discussing the relative prices of various firearms sold by a certain Arkansas FFL, and when KEITA's buyers would be sending payment to enable CC-1 to purchase the firearms.

e. On or about May 22, 2021, CC-1 and KEITA exchanged the following text messages:

CC-1: We gotta go to gunstore before they close at
5
KEITA: I know I'm waiting on you.
KEITA: Get two
KEITA: And the 380
KEITA: Get 2 9
KEITA: And the 380

f. Based on my review of ATF Form 4473s, I know that on or about May 22, 2021, CC-1 purchased three firearms from FFL-1 and, based on my training and experience, I believe they matched KEITA's instructions for "2 9" and "the 380": (i) one Taurus G3C 9mm caliber pistol bearing serial number ACC624910; (ii) one Taurus G3C 9mm caliber pistol bearing serial number ACC620236; and (iii) one Ruger LCP2 .380 ACP caliber pistol bearing serial number 380644222.

g. On or about May 25, 2021, CC-1 sent KEITA a photograph of two firearms in a display case. KEITA responded, "You pulling up." CC-1 then responded, "Do you got the money everything ready."

h. From my review of ATF Form 4473s, I know that on or about that same day, May 25, 2021, CC-1 purchased two firearms from FFL-2 and one firearm from FFL-1, and that KEITA sent two payments to CC-1 through Payment App-1, as detailed above.

20. Based on my review of bus reservations in the name of ABOUDULAYE KEITA, a/k/a "Abdoulaye," the defendant, text messages between CC-1 and KEITA, ATF Form 4473s, NYPD reports, and NIBIN lead information, I believe that KEITA transported firearms purchased in Arkansas using buses traveling between Memphis, Tennessee and New York, New York. For example:

a. Bus records show that KEITA traveled from Memphis, Tennessee to New York, New York by bus at least five times between on or about January 8, 2021 and on or about June 1, 2021.

b. On or about January 8, 2021, at

approximately 1:04 a.m. CT, KEITA texted CC-1, "[CC-1] bro pls bro I need to be on that bus in the morning at 10:00." Approximately 15 minutes later, KEITA further texted, "If you need gas money I can send it tru cash app." From my review of bus records, I know that later that day, on or about January 8, 2021, KEITA took a bus from Memphis to New York, New York.

c. For at least six firearms, KEITA's bus trips from Memphis, Tennessee to New York, New York, fall between the date the firearm was purchased in Arkansas and the date on which either the firearm or casings matched to the firearm were recovered in the Bronx. For example:

i. Bus records show that KEITA traveled by bus on or about January 15, 2021. An ATF Form 4473 and NYPD report show that a firearm purchased by CHRISTOPHER the previous day, on or about January 14, 2021 was recovered in the Bronx on or about March 13, 2021.

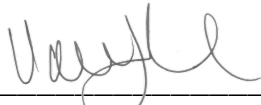
ii. Bus records show that KEITA traveled by bus on or about June 1, 2021. An ATF Form 4473 and NIBIN lead information show that casings matched to two firearms purchased by CC-1 on or about May 22, 2021 and May 25, 2021, respectively, were recovered in the Bronx on or about June 20, 2021 and July 5, 2021, respectively.

21. WHEREFORE, deponent respectfully requests that warrants be issued for the arrest of ABOUDULAYE KEITA, a/k/a "Abdoulaye," and CEDRIC KEYON CHRISTOPHER, JR., the defendants, and that they be arrested and imprisoned or bailed, as the case may be.

Lennea Gordon (by VF with permission)

Special Agent Lennea Gordon
Bureau of Alcohol, Tobacco, Firearms,
and Explosives (ATF)

Sworn to before me by reliable
electronic means pursuant to
Fed. R. Cr. P. 41(d)(3) and 4.1
this 8 day of July, 2022



THE HONORABLE VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK